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*Authorized Designee for the Partnership Defendants, The Brighton Company, The
Lambeth Company and the Popham*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. ESTATE OF STANLEY CHAIS, et al., Defendants.	Adv. Pro. No. 09-01172 (CGM)

**STIPULATION AND ORDER FOR VOLUNTARY
DISMISSAL OF ADVERSARY PROCEEDING**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff
Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III,
and the substantively consolidated chapter 7 estate of Bernard L. Madoff and The Brighton

Company, The Lambeth Company and The Popham Company (the “Partnership Defendants,” together with the Trustee, the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree to the following:

1. On May 1, 2009, the Trustee filed the Complaint against Stanley Chais and several related defendants, including the Partnership Defendants (the “Chais Defendants”) (ECF No. 1).

2. On November 12, 2009, the Chais Defendants answered the Trustee’s Complaint (ECF No. 46).

3. On October 19, 2016, the Trustee entered into a settlement agreement (the “Chais Settlement Agreement”) with certain of the Chais Defendants (the “Chais Settling Defendants”), in accordance with the *Order Pursuant to Section 105(a) of the Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure Granting Authority and Establishing Procedures for Settlement Agreements in Connection with Avoidance Actions* dated November 12, 2010 (*Sec. Inv 'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-01789 (CGM), ECF No. 3181). Pursuant to the Chais Settlement Agreement, a stipulation of dismissal was entered as to the Chais Settling Defendants, excluding the Partnership Defendants, on December 12, 2016 (ECF No. 158).

4. The Partnership Defendants are subject to a Final Settlement Approval Order and Final Judgment issued by the Superior Court of the State of California dated March 1, 2017, in the case *Bottlebrush Investments, L.P. v. The Lambeth Company, et al.*, Case No. BC 407967 (as consolidated). Pursuant to that Order, Jeffrey I. Golden, Esq. was appointed as the authorized Designee of the Partnership Defendants, which entities the Superior Court found to have no distributable assets.

5. The Designee has no opposition to the dismissal of the Partnership Defendants and is not aware of any opposition to the dismissal.

6. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to dismissal with prejudice of the Trustee's claims against the Partnership Defendants in the above-captioned adversary proceeding, and dismissal of the adversary proceeding.

7. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

8. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

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Dated: April 15, 2022
New York, New York

WEILAND GOLDEN GOODRICH LLP

BAKER & HOSTETLER LLP

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*Authorized Designee for the Partnership
Defendants*

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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

SO ORDERED.

**Dated: April 18, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**